



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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June 1, 2007

Ref: 8EPR-N

Mr. Walter Waidelich
Utah Division Administrator
Federal Highway Administration
2520 West 4700 South, Ste. 9A
Salt Lake City, UT 84118-1847

Re: Hyde Park/North Logan Corridor Project, Proposed 200
East Transportation Corridor Between North Logan City and
Hyde Park Draft EIS: CEQ # 20070121

Dear Mr. Waidelich:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C Section 4231 et. seq., and Section 309 of the Clean Air Act 42 U.S.C Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Hyde Park/North Logan Corridor Project located at 200 East; 1400 North to 3700 North between North Logan City, UT and Hyde Park, UT.

EPA's comments on this project focus mainly on water and air quality. Specific air quality concerns include PM 2.5 and PM 10 emissions and impacts, construction related emissions, and cumulative impacts from a number of projects in the area. Since EPA revised the PM 2.5 National Ambient Air Quality Standards (NAAQS), the project area is expected to be designated a nonattainment area for PM 2.5. Although the project alone may not cause additional exceedances of the NAAQS, in combination with other area Highway projects, it will cause some air quality impacts that must be evaluated. The emissions for both PM 10 and PM 2.5 are likely to increase with increases in Vehicle Miles Traveled (VMT), traffic and construction. EPA recommends that an emissions trend analysis be completed for PM 10 and PM 2.5 to evaluate whether the project contributes to or worsens an existing air quality problem.

Construction emissions, caused by the multiple-year construction period associated with this proposed project may result in human exposure to diesel exhaust, a likely human carcinogen. Given the proximity of this project to a school, where children are likely to spend significant amounts of time construction related emissions may be an issue. "Best practices" provides little indication of the measures that will be taken to control dust from exposed soil, re-entrained dust from construction vehicles, increase in dust resulting from soil tracked on existing roads from construction without proper control, and increases in toxic diesel emissions from both highway and non-road construction

equipment. In addition, since this project is part of a series SR-91 projects and since a number of other projects are anticipated, analysis of air emissions for the cumulative and multi-year construction impacts is needed, especially PM 2.5 and PM 10.

We would also like to express an overriding concern with the environmental impacts of growth this project encourages. This corridor approach is likely to cause sprawl as well as many direct and indirect environmental impacts. Projects that reduce vehicle miles traveled, and incorporate walking and other modes of transportation and integrated land use, have the potential of reducing impacts on environmental resources.

EPA recognizes the important role that the Growth Choices process plays in working with the communities to develop transportation options and alternatives. EPA would like to meet with you and discuss strategies for educating the public, city and county planners and policy makers (during the Growth Choices Process) regarding integration of transportation with land use, types of density development, green infrastructure, and other ways to reduce impacts of development and transportation projects on environmental resources.

Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated the build alternatives “EC-2” (Environmental Concerns-Insufficient Information). This “EC” rating means that impacts have been identified that should be avoided in order to fully protect the environment. The “2” rating means that additional information or data is needed to fully assess environmental impacts that should be avoided in order to fully protect the environment. More specifically, for air impacts, an emissions trends analysis for PM 2.5 and PM 10, cumulative impacts analysis of PM 2.5 and PM 10, and construction emissions analysis is needed. For water impacts, a summary of water quality and water quantity impacts of the project on streams in the watershed and cumulative impacts on non-jurisdictional wetlands impacted by removal of irrigation on farmland is needed.

We appreciate the opportunity to participate in this project. If you have any questions or would like to discuss our comments, please contact me (303) 312-6004 or Robin Coursen (303)312-6695 of my staff.

Sincerely,

| /s/

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

cc: Ed Woolford, FHWA
Alex D. Beseris, J-U-B Engineers
Brad Humphreys, UDOT
James McMillan, USACE

bcc: Robin Coursen, EPA
Dave Ruiters, EPA
Jeff Kimes, EPA

EPA Comments Hyde Park North Logan Corridor DEIS

Purpose and Need:

- The purpose and need statement serves as the cornerstone for the alternatives analysis, but should not discuss alternatives. However, this purpose and need includes a statement that the need is to “Provide a roadway parallel to SR-91. . .” This need is effectively an alternative, and its presence in the need statement could screen out other alternatives that are not parallel roads to SR-91. Reducing congestion appears to be the underlying purpose and need that drives a reasonable range of alternatives. For example, adding “parallel to SR-91” may eliminate one or more reasonable alternatives.
- EPA believes that FHWA and Utah Department of Transportation (UDOT) should incorporate any analysis done on transportation demand management (TDM) into this DEIS and explain how, and if, TDM was used in development of alternatives or screening of alternatives. If this has been completed by the Municipal Planning Agencies, this information should be summarized. The explanation of TDM analysis provided on page 2-1 should contain further explanation of why various TDM solutions, combined, did not address the purpose and need and were screened out of the process.

Cumulative Impacts:

- Section 4.22.2 states: “Therefore, no cumulative impacts to land use are anticipated because the City plans have identified and support the changes in land uses within the study area.” EPA believes that without this road growth and land use would develop differently in location, density and type of development. In addition, it would happen at a much different pace. Finally, the proposed changes would have an economic impact on the area as well. Such cumulative economic impacts should be addressed in this section.

Water Quality:

- Section 4.22.4 Water Quality: Historically, irrigation infrastructure has been used for storm water management in this county. However, with any build alternative, the cumulative effect would be an increase in impervious surfaces, subsequent increases in storm water runoff, and subsequent needs to improve the capacities of irrigation canals and ditches for storm water management. EPA commends the analysis on cumulative storm water impacts completed in this DEIS. This analysis was done on a watershed basis and reflects potential cumulative impacts. The cumulative contribution of storm water for this study is 11 percent of the storm water runoff generated by all of the cities in the local watershed. Although it is anticipated that the City’s Storm Water Management Plans (SWMPs) and source water protection plans will

mitigate any impacts, direct or cumulative, EPA suggests that the City analyze the efficacy of utilizing “Green Infrastructure” for mitigation purposes. Green Infrastructure promotes ecosystem sustainability and helps to mitigate impacts from storm water runoff along with many other watershed and habitat benefits of this approach. The City, County, FHWA, UDOT, and Municipal Planning Organizations (MPOS) can use this “Pre-build-out” opportunity to plan Green Infrastructure into the overall land use and transportation planning process before build out and “Grey Infrastructure” makes it impossible to do so. This ecosystem approach could be used to create wetlands (e.g. mitigation of lost wetlands supported by irrigation), mitigate the additional storm water run off created by impervious surfaces, create green space for recreation (mitigate loss of Land Water Conservation Fund properties), create wildlife connectivity, reduce effects of habitat fragmentation, provide walk/bike corridors. More information on Green Infrastructure can be found at <http://www.greeninfrastructure.net>

- Section 4.22.5: As farmland is converted to non-agricultural land uses, the removal of irrigation would result in the loss or shrinkage of wetlands supported by man-made irrigation. These impacts to wetlands would contribute to the cumulative loss of wetland habitat in the local watershed. EPA recommends that these cumulative wetland impacts be evaluated pursuant to Executive Order 11990 Protection of Wetlands.
- Section 3.10.2: This section does not document the existing water quality. The DEIS needs to include the existing water quality and stream flow data of the streams in the project area so that an adequate impact analysis can be conducted. Currently, this data does not appear in the document. In addition, ground water quality should also be documented and analyzed.
- Section 3.11.1: The EIS indicates that United States Army Corps of Engineers (USACE) defines “normal circumstances” as the hydrological, soil, and plant conditions that are normally present in an area in the absence of human management. EPA’s understanding is that “normal circumstances” are the conditions that occur “normally” if human management occurs “normally.” For example, the habitat present as a result of the human management *is* the normal condition. Please contact USACE for the proper definition.
- Chapter 4: The No Build Alternative documents the impacts on the existing environment of the No Action Alternative. These impacts can be compared with the Build Alternatives as well as existing environment. Chapter 4 should document the impacts of the alternative, including No Build, on the existing environment. Some of the “media” sections, such as air, compare this in the tables (page 4-46) but others do not; e.g. Wetlands (4-71). EPA recommends that all media sections describe the No Build impacts and include them in any tables presented.

Air Quality:

- Table 3.8.1.1: Cache and Weber Counties are exceeding the PM_{2.5} standard and are likely to be designated as a PM 2.5 non-attainment area. This fact should be discussed and the associated monitoring data for PM 2.5 so noted. Any available monitoring data should be

listed in this table and in the following section for PM_{2.5} and all other air pollutants for which it is available.

- Section 3.8.1.2: Given the fact that this area has significant issues with PM_{2.5} this section should discuss PM 2.5.
- Section 3.8.2: The frequent winter temperature inversions and associated air quality conditions need to be discussed in much more detail in this section on “existing conditions.” The inversion have a great impact on the air quality in this project area
- Section 4.1: This section should indicate the impacts of corridor-type development. For example the likelihood of increased vehicle use and the environmental impacts associated with both. See the Smart Growth heading of these comments for further comment on land use.
- Section 4.1.3.2: The statement that there would be no indirect impacts associated with the project is not well substantiated and should be discussed further. In addition, it is extremely unlikely that PM 10 emissions resulting from road dust will be less considering that there will be increased VMT. Please include tables indicating the current estimated emissions and VMT or Annual Average Daily Traffic (AADT) and the estimated future VMT or AADT of the alternatives (including no-build).

Smart Growth

- The corridor approach of nonintegrated land use and transportation development fostered by the Growth Choices process is likely to cause sprawl as well as many direct and indirect environmental impacts. Though the geographical constraints of the mountains (on one side) and the marshes and farmland (on the other) somewhat dictate development in this corridor, transportation design in this growing community will permanently dictate the growth patterns and ability of the community to access services, possess mobility and control connectivity. A higher density, well planned development concentrating the City Center, “community development,” recreation center and Utah State University Campus all within walking distance of each other and intersected by numerous low traffic, grid patterned streets would greatly enhance the mobility and attractiveness of the area and possibly reduce VMT and associated impacts or at least slow the growth rate. Projects that follow such an approach often reduce impacts on environmental resources as well.

